

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI

“LILY,” “SARAH,” PIKES PEAK  
PROBATE SERVICES as Conservator for  
“SIERRA,” “SOLOMON,” “HENLEY,”  
WILLIAM L.E DUSSAULT as Guardian ad  
Litem for “VIOLET,” a minor, JANE ROE, as  
next of friend for “PIA,” a minor, “JENNY”,  
and ‘FIONA.’

Plaintiffs,

v.

MICHAEL MILLIMAN,

Defendant.

Case No:

Jury Trial Demanded

**DECLARATION OF CAROL L. HEPBURN IN SUPPORT OF  
PLAINTIFFS’ MOTION TO PROCEED UNDER PSEUDONYMS**

I, CAROL L. HEPBURN, hereby declare the following to be true and correct under penalty of perjury of the laws of the United States of America:

1. I represent the Plaintiffs. I make this Declaration in support of their motion to proceed in this matter using pseudonyms.

2. Each of the plaintiffs herein is a victim of multiple child pornography offenses committed in multiple states around the country. I have represented Lily, Sarah, Sierra, Solomon and Violet for a number of years. Over time, I have submitted on their behalf requests for restitution in federal criminal courts in many jurisdictions. In each of these requests, a pseudonym has been used in order to protect their anonymity. No court has yet ordered them to use their legal names in any court proceeding.

3. Lily, Sarah, Sierra, Solomon and Violet are each real individuals whom I have

personally met and represented for a number of years. Each is the subject of an individual forensic psychological exam detailing the emotional injuries arising from the circulation of their child sex abuse images. Each has significant psychological injuries resulting from the child pornography related crimes of which they are victims. Like other victims of these crimes, these young women and men fear the prospect of the consumers of the images of their sexual abuse seeking them out and attempting to initiate contact with them or sexually assault them. Lily, Sarah, and Solomon are adults. Sierra is also an adult but also is the subject of a conservatorship in her state of origin. Violet is a minor and is represented by a Guardian Ad Litem appointed in her state of origin. Each of these victims of image exploitation crimes lives in fear of unwanted contact from someone who has seen their images. Each believes that exposing their legal names to the public record puts them in physical danger and would compound the emotional harms that they suffer.

4. Lily, Sarah, Sierra, Solomon, and Violet are very afraid to have their legal names linked with the fact they are child pornography victims or to allow any information about their identities to be publicly revealed, where they live, or other information that might enable predators to locate them.

5. Lily has been stalked by consumers of child pornography. One such person was prosecuted and convicted in the United States District Court, District of Nevada, for stalking her. He suggested that she and he might make new pornography together.

6. Solomon has received unwanted contacts via telephone from individuals who apparently had seen his child sex assault images on the internet. Sarah has also experienced having a stranger send her a link to images of herself as a child being sexually assaulted. For both Solomon and Sarah, these incidents were profoundly disturbing and cause them to feel

unsafe today.

7. Plaintiffs request permission to use pseudonyms herein in order to protect themselves from harassment, injury, ridicule and personal embarrassment.

8. Each of the Plaintiffs herein has severe psychological injuries resulting from the child pornography related crimes of which she is a victim. Each suffers from hyper-vigilance and paranoia relative to the prospect of the consumers of the images of their sexual abuse seeking them out and attempting to sexually assault them. Each believes that exposing their legal names to the public record puts them in physical danger.

DATED this 22nd day of December, 2022, at Seattle, Washington.

CAROL L. HEPBURN, P.S.

By: /s/ Carol L. Hepburn  
Carol L. Hepburn, Pro Hac Vice  
PO Box 17718  
Seattle, WA 98127  
Attorney for Plaintiffs Lily, Sarah, Sierra, Solomon  
and Violet